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# Transportation/Hazardous Materials: Pipeline and Hazardous Materials Safety Administration Interpretive Letter Addressing Shipping Descriptions

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The United States Pipeline and Hazardous Materials Safety Administration ("PHMSA") addressed in an October 3rd interpretive letter a request regarding Hazardous Materials Regulations ("HMR") applicable to proper shipping names ("PSN").

PHMSA was responding to a May 3rd query from Rinchem Company, Inc. ("RCI").

RCI in its May 3rd letter provided an example of:

- UN1219, Isopropanol or Isopropyl alcohol, 3, PG II where Column (2) of the § 172.101 Hazardous Materials Table (HMT) lists both "Isopropanol" and "Isopropyl alcohol" in Roman type as PSN alternatives.

The question posed was whether a shipper may use both – at the same time – for the shipping description of a hazardous material required by § 172.202 or whether the intent is to use only one at a time.

PHMSA states that the intent of the shipping description requirements is to include one PSN that most appropriately describes the material. It provides as an example:

. . . for "UN3164, Articles, pressurized pneumatic or hydraulic containing non-flammable gas, 2.2" the selected PSN must indicate whether the article is pneumatic or hydraulic—it cannot be both.

PHMSA notes, however, that in the instance of UN1219, Isopropanol or Isopropyl alcohol, 3, PG II, the PSN alternatives are variations of the chemical name that describes the material itself. As a result, the agency states it is permissible to show the PSN as one of the alternatives with the other as a chemical or technical group name in parentheses either between the property shipping name and hazard class or following the basic description. It cites in support 172.202(d).

The rationale for this conclusion is its belief that such a scenario accurately describes the material.

A copy of the interpretive letter and the original RCI request can be downloaded [here](#).